

# Exhibit A

Scott L. Shleifer

March 10, 2025

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1 UNITED STATES DISTRICT COURT  
 2 SOUTHERN DISTRICT OF FLORIDA  
 3 WEST PALM BEACH DIVISION  
 4 CASE NO. 9:24-cv-80713-RLR

5 SCOTT L. and ELENA SHLEIFER,

6 Plaintiffs,

7 vs.

8 UNITED STATES OF AMERICA,

9 Defendant.

10 -----/

11  
 12 DEPOSITION OF SCOTT L. SHLEIFER  
 13 TAKEN BY THE DEFENDANT

14 DATE: March 10, 2025

15 TIME: 3:50 p.m. to 5:57 p.m.

16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25 Job No. CS7226751

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1 THEREUPON:

2 SCOTT L. SHLEIFER

3 having been first duly sworn by me, was examined and  
 4 testified as follows:

5 THE WITNESS: I do.

6 DIRECT EXAMINATION

7 BY MS. KING:

8 Q. All right. We are here today in the  
 9 matter of Scott and Elena Shleifer verse the United  
 10 States and as an action in the United States  
 11 District Court for the Southern District of Florida.  
 12 My name is Amanda King, and I represent the United  
 13 States. The date is March 10th, 2025 and the  
 14 deposition is taking place at Gunster, located at  
 15 777 South Flagler Drive, Suite 500 East, West Palm  
 16 Beach, Florida. And then I'm going to have everyone  
 17 in the room announce themselves, for the record.

18 MR. FLYNN: Kevin Flynn, and I'm Scott  
 19 Shleifer's attorney.

20 THE WITNESS: I'm Scott Shleifer.

21 MS. KING: And, Hana, do you want to  
 22 announce yourself, for the record?

23 MS. BILICKI: Hana Bilicki, for the United  
 24 States, listening telephonically.

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1 role in 2014 with the firm?

2 A. In 2014 I was one of the people who was  
 3 helping us manage a private equity business. So  
 4 Tiger Global has a series of funds that have been  
 5 base raised, starting in 2003, when my partner Chase  
 6 and I co-founded like a fund that had \$76 million.  
 7 And during 2014 I was kind of one of call it  
 8 three-ish senior, senior partners, helping run that  
 9 business. And so run that business meant -- By a  
 10 time perspective, it meant trying to find companies  
 11 that we could invest in, that were private, like not  
 12 publicly traded on like the NASDAQ or S & P 500,  
 13 that we thought were going to be really good  
 14 businesses, that would make profit, and that owning  
 15 shares in them would help our investors make money.  
 16 And so we specialized or we spent the vast majority  
 17 of our time and capital invested investing in  
 18 emerging markets, including China, Russia, Brazil  
 19 and Argentina. And so during 2014, for example, I  
 20 ended up flying about 280 hours on a private jet for  
 21 work.

22 Q. Okay.

23 A. I actually don't have the exact number for  
 24 personal, but it was much smaller. And I believe I  
 25 did one or two trips to China and then I think it

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1 to make sure that was the same person. And what was  
 2 Chase's involvement with everything?

3 A. Well, he founded Tiger Global.

4 Q. Okay.

5 A. And he was involved in everything. He was  
 6 involved in the investing, the running of the  
 7 business. Oh, by the way, that was just my private  
 8 equity hat.

9 Q. Okay. Oh, I'm sorry.

10 A. In addition, we have -- At the time I  
 11 don't know whether we had one or two, we had a hedge  
 12 fund, and I was a partner in that, also. And so I  
 13 was also doing research on publicly traded  
 14 companies.

15 Q. And what kind of research were you doing  
 16 for the publicly traded companies?

17 A. Similar. Kind of the same research. Is  
 18 it a good management team? How big is the industry?  
 19 Ultimately, we were trying to figure out how much  
 20 net profit would a company generate and then like  
 21 was that a lot, relative to the current price or  
 22 market cap of the company, or not?

23 Q. And I did some work in my LM program on  
 24 hedge funds and private equity, so just a question  
 25 now for your clients. Do you have clients that

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1 long, but we were making a guestimate of how many  
 2 hours per year would I need to -- would I need, and  
 3 the primary use case was business.

4 Q. And I don't want to put words in your  
 5 mouth, so correct me if I'm wrong. You said you  
 6 looked at them for hours. Was that for business and  
 7 for personal usage?

8 A. Yep. Yep. And our process was that we  
 9 would make a guestimate for both, based on what we  
 10 had done, you know, and what we expected, going  
 11 forward. And that plane, in particular, you know,  
 12 the reason that we needed -- and I'm sure you're  
 13 familiar or you might be familiar -- you know, a  
 14 Global 6000 is like a long-haul plane. And it is --  
 15 In my opinion, it was far better suited for my  
 16 business needs than for my personal needs, because,  
 17 yeah, in 2014 I think we had like three little kids.  
 18 And so we did not often venture out very far with  
 19 them. But a Global 6000 is perfect if you're going  
 20 to -- If you live in New York City and you're going  
 21 to Beijing, Shanghai, Moscow, Buenos Aires, Rio-Sao  
 22 Paulo, Amsterdam, which were all places that I flew  
 23 for business in 2014, you need kind of something  
 24 that can fly long distances. Whereas, if you're  
 25 vacationing in like Florida and you live, you know,

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1 in New York City, you could have something that is  
 2 much smaller.

3 Q. Do you remember how you paid for your  
 4 interest with that -- for that aircraft?

5 A. Yes.

6 Q. How was that?

7 A. I believe money from my bank account.

8 Q. Okay. I'm going to pull --

9 A. Oh, I think it was actually multiple ways.

10 Q. Okay.

11 A. I think it was mostly money from my bank  
 12 account and then I think it was partly like other  
 13 shares of -- or other like assets that I had with  
 14 NetJets that -- other shares that I had with  
 15 NetJets, where I was receiving value for an existing  
 16 stake or lease.

17 Q. Uh-huh.

18 A. And then I believe the majority of it was  
 19 just like money from a bank account.

20 Q. I'm going to hand you what's been marked  
 21 as Exhibit 19.

22 (Thereupon, Defendant's Exhibit No. 19 was  
 23 marked, for identification).

24 BY MS. KING:

25 Q. If that sounds off, it's because I'm

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1 BY MS. KING:

2 Q. And on the top it says statement from  
 3 November 1st, 2014 through November 30, 2014. Do  
 4 you see that?

5 A. Yep.

6 Q. And it says that it's a bank statement for  
 7 SLS Travel, LLC. Do you see that, as well?

8 A. I do.

9 Q. Is this your account, through SLS Travel?

10 A. I don't know who technically like owns the  
 11 account, but I believe SLS Travel is -- I'm Scott  
 12 Louis Shleifer, so I believe that this is an entity  
 13 that I own and control. And I believe that we set  
 14 it up to own whatever stakes in planes that we had.

15 Q. Do you know who had access to this account  
 16 in 2014?

17 A. I don't recall.

18 Q. Do you remember if you had access to this  
 19 account in 2014?

20 A. I don't recall.

21 Q. And don't speculate. Would this -- It  
 22 says Visitas Partners here, so would it be safe to  
 23 assume that this would have been an account that  
 24 Mr. Cramer would have had access to?

25 A. Yes. Yes. Like it is likely -- I don't

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1 classification of SLS was in 2014?

2 A. I don't.

3 Q. Do you know what the business address of  
 4 SLS Travel was in 2014?

5 A. I don't.

6 Q. Do you know what address is 895 Park  
 7 Avenue, Apartment 14C, New York, New York?

8 A. Uh-huh.

9 Q. And what's at that address?

10 A. That was an apartment that we used to own  
 11 and we -- I believe that we owned it in 2014, and  
 12 that is where -- That is where me and my family  
 13 lived in 2014.

14 Q. I was going to assume that was it the  
 15 family, but I just wanted to make sure.

16 A. Yep. Yep. That's where me and my family  
 17 worked -- sorry -- lived.

18 Q. And just to confirm or follow up with one  
 19 more question -- You've answered some of these, so  
 20 this will take me a second to sort of go through.  
 21 We talked about some of your travels and you were  
 22 saying that you went to Beijing. Did Tiger Global  
 23 Management require you to travel for work?

24 A. Yeah. Like I had to add value or else --  
 25 Like I had to add value or else I would be fired.

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1 And so, yes, part of my job was traveling and doing  
 2 research on companies that would -- companies that  
 3 would be great, well, existing investments, as well  
 4 as potential new investments.

5 Q. And to just dig a little deeper on that,  
 6 what did you do when you were on business-related  
 7 travel for your --

8 A. Go to meetings. So we would go to --

9 Q. I'm trying to ask you questions, without  
 10 getting too much into like -- I don't want to get  
 11 into like the private business that you're -- I'm  
 12 trying to get as much information as I need, without  
 13 going into the more --

14 A. It took -- Business trips took, you know,  
 15 many kind of what I think were normal forms, where I  
 16 was doing diligence. So, oftentimes, I was going to  
 17 company's offices, where their chief executive  
 18 officer and chief financial officer were based. And  
 19 there were some investments, like I believe a trip  
 20 to China, where we were invested in a company that  
 21 is sort of like the Amazon of China, it's called JD,  
 22 and I believe I was in Beijing, meeting with some  
 23 existing and prospective investment opportunities,  
 24 and then I flew to Shanghai to go to a warehouse, a  
 25 new warehouse they were building, that they thought

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1 was going to lower their cost of production and  
 2 allow them to provide better value to consumers in  
 3 China, and make money. And so sometimes it was, you  
 4 know, visiting like what a company did. Like if it  
 5 was an Amazon of China, going and walking their  
 6 warehouses and like learning about the business, by  
 7 seeing it. And so it was often meetings at a  
 8 company's offices, due diligence visits to whatever  
 9 the company did. Yeah. And then like you're  
 10 staying at a hotel and you're sleeping somewhere and  
 11 then you're doing it for however many days you're  
 12 there.

13 Q. And did you book your own travel?

14 A. Nope.

15 Q. Who did that?

16 A. Margot Landau, or whoever my EA was, which  
 17 I believe was Margot Landau and I think Tiger Global  
 18 works with a travel agent, so I don't know who  
 19 was -- Like, yeah, I just -- I was usually  
 20 communicating my EA.

21 Q. And when you say communicating, with  
 22 Margot, how would you do that? What form would that  
 23 take?

24 A. Multiple formats, likely. It included  
 25 in-person conversations, phone conversations,

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1 Q. Yeah.

2 A. I believe my start date, I think it was  
 3 July, 2002.

4 Q. Okay.

5 A. I just "ish", February, March, April, 2002  
 6 is likely when I met Chase.

7 Q. Do you know how many partners there were  
 8 when Tiger Global was formed?

9 A. No.

10 Q. Do you know how many partners there are  
 11 now?

12 A. Nope.

13 Q. Do you remember any of the other partners  
 14 in 2014?

15 A. Yes.

16 Q. Who?

17 A. Chase, Feroz Dewan, me. I don't know who  
 18 else were partners. I don't know who else were  
 19 partners then.

20 Q. That's fine. In 2014, do you remember if  
 21 you had a partnership ownership?

22 A. What do you mean?

23 Q. I always think of it in like the law firm  
 24 context, where you have to buy in to become a  
 25 partner in the firm. Did you have to do anything

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1 at Tiger Global and our investors.

2 Q. Like I said, nitty-gritty, so what you can  
 3 remember would be great. If not, same format as  
 4 before, just let me know whether or not. What  
 5 supplies did you need to do your job in 2014?

6 MR. FLYNN: Objection, as to vague, but if  
 7 you can answer, Scott.

8 THE WITNESS: We needed great research.

9 BY MS. KING:

10 Q. Okay.

11 A. Like we needed great research. We needed  
 12 to have a really good opinion about was a company a  
 13 good company or a bad company, in terms of, you  
 14 know, its ability to make net profit and have a high  
 15 return on capital? Was it managed big good ethical  
 16 people or not? You know, how talented were those  
 17 people at, you know, building a company?

18 Q. Uh-huh.

19 A. And everything that goes into that. And  
 20 so like the supplies that I -- And I think this is a  
 21 general answer, as opposed to one that is specific,  
 22 just anyone who's in investing, you need to be able  
 23 to learn a lot about a company. So we did that a  
 24 lot of ways, including visiting the company, doing  
 25 financial modeling, you know, receiving balance

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1 sheets, income statements, statements of cash flows,  
 2 from historical periods.

3 Q. With the financial modeling, what kind of  
 4 software did you use for that?

5 A. Microsoft Office is really great. It's  
 6 really great. You know, Excel is great. Word is  
 7 great. PowerPoint is great. Email is great.  
 8 There, you know, any email, but Microsoft -- I don't  
 9 even know what -- Yeah.

10 Q. And breaking it down on more of a level  
 11 even simpler than the great explanation you just  
 12 gave me, what kind of tools? So did you need a cell  
 13 phone to connect to business in 2014?

14 A. Yes.

15 Q. And then how was that paid for?

16 A. I believe it was paid for by the company,  
 17 by Tiger Global.

18 Q. Did you have a work computer in 2014?

19 A. Yes.

20 Q. And who paid for that?

21 A. Tiger Global.

22 Q. And did you have any subscriptions to  
 23 publications in 2014?

24 A. Probably.

25 Q. And I won't ask a follow-up question,

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1 do diligence on companies and also if we were going  
 2 to buy shares or sell shares, we needed lawyers to  
 3 help us do that.

4 Q. And who would pay for the lawyers and the  
 5 research fees and all of that?

6 A. I don't recall.

7 Q. What expenses did you, personally, incur  
 8 in 2014 for your work through Tiger Global  
 9 Management?

10 A. Well, I believe that we were -- there were  
 11 a couple of partners who had the resources to use  
 12 private jets, and we were doing that and we were  
 13 like -- I believe I paid for my private jet and then  
 14 we kept track of what hours were business related  
 15 and what hours were personal, and then we would  
 16 deduct what was business related and not deduct what  
 17 was personal.

18 Q. When you said a few of us had the  
 19 resources to use private jets, what did you mean by  
 20 that?

21 A. I don't believe that I -- Well, I just --  
 22 I think that other people at Tiger Global also  
 23 had -- or maybe one person. I don't know. I think  
 24 it was maybe just -- I don't -- I'm not going to  
 25 speak for anyone else at Tiger Global, but my deal

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1 with Tiger Global was that I was going to pay for  
 2 that cost, personally. And I believe it was  
 3 because -- And I don't even know when this  
 4 conversation or conversations occurred, but I think  
 5 many of us thought it would be difficult to have a  
 6 travel policy and like decide who would be able to  
 7 have a company paid for private jet, who wouldn't,  
 8 how many hours would we procure, how many planes,  
 9 and so at some point instead of doing -- instead of  
 10 having Tiger Global -- And this is, by the way, in  
 11 2014 and before --

12 Q. Of course.

13 A. -- and things could have changed, you  
 14 know, in the last 11-ish years, but that it was  
 15 decided that if you wanted to fly -- Like if I  
 16 wanted to fly private, I could pay for it and I --  
 17 and then I don't recall whether or not -- It's  
 18 possible that I was reimbursed for like commercial  
 19 travel costs. I don't know if that was the case or  
 20 not, but I believe we tried to have a policy to just  
 21 say we have a policy, you can either fly coach, or  
 22 business or first. I believe there was like a  
 23 policy and who could do what, but it did not include  
 24 private jets. And if you wanted a private jet, you  
 25 paid for it yourself and then your team had to be

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1 responsible for, you know, how much is business, how  
 2 much was personal.

3 Q. I'm going to go back and break that answer  
 4 with two other questions to follow up. You said,  
 5 "My deal was" that you would pay for it. What do  
 6 you mean by your deal?

7 A. I just knew what was expected of me. I  
 8 actually did not -- I don't know what the other  
 9 partners did. I think -- Like I could guess.

10 Q. I only care about you.

11 A. Yeah. I just knew that my agreement with  
 12 my partners was that I would pay for all my private  
 13 airplane travel, on my own.

14 Q. And did you have that in any like kind of  
 15 written deal? Was it verbal? What was that reduced  
 16 to?

17 A. I don't know. I don't know. I mean, I  
 18 perceived it as like a -- I don't know if there was  
 19 documentation supporting that, but I know that that  
 20 is what I did --

21 Q. Uh-huh.

22 A. -- because of what I understood to be like  
 23 the deal that I had agreed on with my partners.

24 Q. And you -- The second thing you said later  
 25 was "My team." And who are you referring to when

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1 with personal.

2 A. Personal. We actually -- The hotel --  
3 Aside, the hotel that we stayed at was one that we  
4 did a Tiger Global retreat at.

5 Q. Okay.

6 A. And then -- Well, actually, maybe it  
7 wasn't. You know what? Strike that. Strike that.  
8 It looks like a personal trip.

9 Q. Okay. There's the next reservation number  
10 is round trip between Teterboro and Augusta, for  
11 November 4th and 5th.

12 A. Personal.

13 Q. Personal. Okay. And then after that is  
14 reservation number 6817508, which is Teterboro to  
15 Anchorage, Anchorage to Beijing, Beijing to  
16 Shanghai, Shanghai to Anchorage, Anchorage to  
17 Teterboro.

18 A. Business.

19 Q. Okay. And we talked about these flights,  
20 but let's break it down more. There was a flight  
21 from Beijing to Shanghai. Why did you go from  
22 Beijing to Shanghai?

23 A. Business. I don't know the exact meetings  
24 that -- Like I don't know like all the meetings that  
25 I had in Beijing and all the meetings that I had in

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1 Shanghai, but I believe that primary or one of the  
2 primary purposes of my trip there was the firm's  
3 largest investment in late 2014 was a company called  
4 JD. It's sort of like the Amazon of China, and we  
5 had invested about a little over \$200 million into  
6 the company and it went public in mid 2014. And in  
7 2015 we ended up distributing a little over  
8 \$6 billion. And so it was the largest winner -- It  
9 is the largest -- To my knowledge, the largest  
10 winner in the history of our firm, by a lot. But  
11 we've also had investments that did not work out.  
12 And so in late 2014 this was like the firm's biggest  
13 investment, by I don't recall what percentage of our  
14 like assets under management it was, but it was a  
15 lot. Because, you know, our \$200-ish million  
16 investment had ballooned. The company performed  
17 really, really well and it had ballooned in value to  
18 billions, just our stake. And it had gone public on  
19 I don't even know what U.S. exchange it was. Either  
20 New York Stock Exchange or NASDAQ. I don't know  
21 which one. And so and a huge part of the investment  
22 research, because it's like a low margin business,  
23 it's kind of like Amazon or like any retailer, where  
24 like their profit margins aren't like 50 or  
25 60 percent. They could be a half a percent, one

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1 percent, two percent, negative two percent. And so  
2 one of the primary areas of diligence that we did on  
3 JD for a long time is like their cost structure.  
4 And to my knowledge -- They had opened up a new or  
5 were opening up a new warehouse in Shanghai, that  
6 they thought was going to be like better than --  
7 like a lower cost of production than all the other  
8 ones that they had, and that that was going to be  
9 their model for their future distribution centers  
10 and warehouses. And so I wanted to go see it. And  
11 so -- And I believe that the CEO of the company,  
12 Richard Liu, gave me a tour of it, you know, when I  
13 was in Shanghai. And I don't recall whether I -- I  
14 don't recall whether I met with anyone from JD when  
15 I was in Beijing, but I believe that a couple of JD  
16 executives rode on the plane with me, from Beijing  
17 to Shanghai and then I believe that they came with  
18 me and also did that facility tour with me, and then  
19 the CEO, Richard Liu. He was the CEO, at the time.  
20 I don't think he's the CEO of JD today.

21 Q. We've been going for 45 minutes. I saw  
22 you look at your phone. We can take a break, if you  
23 have something you need to tend to, quickly.

24 A. Nope.

25 Q. Okay. And just to tie the loop, I know we

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1 meeting. I don't -- I believe that at some point we  
2 looked at the Diapers.com of China. I don't recall.  
3 Q. Well, today I learned that there's a  
4 Diapers.com, so that's kind of cool. You can tell I  
5 don't have kids yet. So going over to the passenger  
6 side, there are two passengers and I'm so -- I try  
7 to be so careful and cautious of the name, but it's  
8 Bin Chang and Haoyu Shen?

9 A. Yep.

10 Q. Do you recall those names?

11 A. Vaguely.

12 Q. Do you remember who -- Like can you tell  
13 me who they are?

14 A. I believe they were employees of -- I  
15 believe they were senior employees of JD.com, like  
16 JD the Amazon-ish of China.

17 MS. KING: We're at an hour, so I'm going  
18 to go ahead and take a five-minute break, see  
19 what we may have answered and see what we can  
20 do. I'm just trying to keep this as  
21 streamlined as possible.

22 MR. FLYNN: Sure. Sure.

23 (Thereupon, there was a recess taken).

24 MS. KING: Back on the record.

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1 BY MS. KING:

2 Q. And do you recall if at any point, while  
 3 working at Tiger Global Management, did they pay for  
 4 Heliflites for you?

5 A. I don't recall.

6 Q. And who would have booked the Heliflites  
 7 for your travel?

8 A. I don't recall. Like best guess, Margot.  
 9 I mean, it could have been John Cramer. I just -- I  
 10 don't know what the protocol was, or I do not  
 11 recall.

12 Q. And to put it in -- Why would you book  
 13 private, versus booking commercial, for work-related  
 14 travel in 2014?

15 A. Uh-huh. Efficiency. Efficiency like to  
 16 be able to do these trips, in an efficient way.

17 Q. And what do you mean by that?

18 A. Yeah. So private travel has many benefits  
 19 to me. It allows me to just typically reduce the  
 20 amount of time that business trips, well, and  
 21 personal, but certainly business trips, to reduce  
 22 the amount of time that the trips take.

23 Q. Okay.

24 A. And that because you can leave at a time  
 25 that is convenient and you can return at a time that

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1 is convenient, as opposed to when commercial flights  
 2 happen to run from those cities to where I was  
 3 living, in Manhattan. And so it was time savings to  
 4 me.

5 Q. And --

6 A. And efficiency.

7 Q. If we go about --

8 A. Oh, and it was also like, for business  
 9 purposes, having access to private jets, like this  
 10 is my belief, I would have done less business  
 11 travel, had I not had that. And so business travel  
 12 in my lifetime has been extraordinarily profitable  
 13 for our customers, our limited partners, and by the  
 14 transit property, me and my family, because I've  
 15 only ever been compensated for like good, productive  
 16 work. And if the work wasn't good and productive,  
 17 then, yeah, I wouldn't get -- We didn't have a  
 18 business, and I wouldn't get compensated. Sorry. I  
 19 wouldn't get compensated. Strike the "We wouldn't  
 20 have a business." Strike that. Just like I  
 21 wouldn't get compensated.

22 Q. Going I'm going to call it about  
 23 two-thirds, there's a flight on 5-25-2014, Teterboro  
 24 to Buenos Aires and it says that you flew back  
 25 commercial. Do you recall if that was the only time